

From: [David Deckman](#)
To: [Boparai, Poonam](#)
Subject: Status of County GHG Guidance
Date: Monday, March 25, 2013 2:57:15 PM

Poonam,

We received some internal comments on the Soitec EIR about the appropriate threshold to use for GHG emissions. As we had discussed, we were using the 900 MT CO2E threshold in current County interim guidance. The revised guidance that was developed in conjunction with the Climate Action Plan (CAP) appears to still be in draft form (http://www.sdcounty.ca.gov/pds/advance/Draft_Guidelines_for_Determining_Significance_Climate_Change.pdf). You had mentioned that it was undergoing further evaluation. Do you know the current status or when it might be adopted by the Board of Supervisors?

Also, if we were to use the new 2,500 MT CO2E threshold (depending on when the public DEIR is released), it is my understanding that this threshold applies only to a proposed project's annual operational emissions, such that if a proposed project's operational GHG emissions would be less than 2,500 MT CO2E per year, then the annual construction emissions would be expected to be under this threshold as well and no quantitative analysis of the construction GHG emissions is needed. Thus, there is no need to amortize the construction emissions and add them to the operational emissions. I understand that if the "efficiency metric" were used (which wouldn't be a good threshold for a renewable energy project), then the amortized construction emissions would be added to the operational emissions and the result divided by the "service population." Is that your understanding?

Thanks.

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